Gregory A. Ross LAW OFFICE OF GREGORY A. ROSS, P.C. 4245 Kemp Blvd, Suite 308 Wichita Falls, Texas 76308 Telephone (940) 692-7800 Facsimile (940) 692-7813 State Bar No. 17302500 Attorney for Debtors

IN THE UNITED STATES BANKRUPTCY COURT FOR THE NORTHERN DISTRICT OF TEXAS WICHITA FALLS DIVISION

ı

13-70230-hdh-13
13)
_

MOTION TO REINSTATE CHAPTER 13 BANKRUPTCY

TO THE HONORABLE UNITED STATES BANKRUPTCY JUDGE:

NOW COMES ANTHONY STEPHEN CRUMP AND TINA MARIE CRUMP, Debtors, and bring this Motion to Reinstate Chapter 13 Bankruptcy and would respectfully show this Court the following:

- 1. On August 2, 2013, this Court entered an Order Dismissing Case, dismissing the above-numbered and styled Chapter 13 Bankruptcy filed with this Court. The reason for dismissal is due to, "Debtor(s)' did not pay the Trustee the first payment specified in the Debtor(s) Plan within 30 days after the Petition date."
- 2. Debtors can and will be current on their Plan payments if an Order is entered.

3. Debtors bring this Motion pursuant to Rule 60 of the Federal Rules of Civil Procedure to relieve them from the disastrous effects of the Court's Order Dismissing Case.

PRAYER

Debtors pray that this Court grant their Motion to Reinstate Chapter 13 Plan and reinstate Debtors' case.

Respectfully submitted,

/s/ Gregory A. Ross Gregory A. Ross State Bar No. 17302500 Attorney for Movant

LAW OFFICE OF GREGORY A. ROSS, P.C. 4245 Kemp Blvd, Suite 308 Wichita Falls, Texas 76308 Telephone (940) 692-7800 Facsimile (940) 692-7813 State Bar No. 17302500

CERTIFICATE OF SERVICE

I hereby certify that a true copy of the foregoing Motion was on August 5, 2013, duly served on all parties of interest.

/s/ Gregory A. Ross Gregory A. Ross

 $c:\best{case}\crump\reinstate$